

KIM BAE, P.C.
ATTORNEYS AT LAW

2160 North Central Road, Suite 303
Fort Lee, NJ 07024

201.585.2288 201.585.2246

110 East 59th Street, 22nd Floor
New York, NY 10022

212.319.6888 212.319.7539

* Please reply to New Jersey office

September 13, 2011

Via ECF and Regular Mail

Hon. Shira A. Scheindlin
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, New York 10007

Re: Hyunmi Son v. Reina Bijoux, Inc., et al.
Case No. 11-Civ.-2315 (SAS)

Dear Judge Scheindlin:

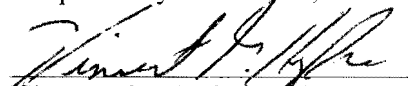
Kim & Bae, P.C. represents the defendants in the above-referenced matter. Defendants respectfully request a stay of discovery pending the Court's determination on Defendants' Motion to Dismiss. Prior to sending this letter to the Court, the undersigned contacted Plaintiff's Counsel to request that he consent to a stay of discovery. He declined.

On June 23, 2011, Defendants filed their Motion to Dismiss the first and third causes of Plaintiff's Complaint, pursuant to Federal Rule of Civil Procedure 12 (b)(6), on the grounds that said causes of action fail to state a claim upon which relief can be granted. The first and third causes of action attempt to state claims under 42 U.S.C. § 1981 and the Fair Labor Standards Act, respectively. Indeed, the Court's decision on the motion could narrow the scope of permissible discovery.

The Defendants run a small business and discovery could be very costly to them. It would be a waste of Defendants' resources to engage in potentially unnecessary discovery. Furthermore, should discovery disputes arise while the Motion to Dismiss is pending it could unnecessarily tax the Court's resources.

Accordingly, Defendants respectfully request that the Court stay all discovery in the above-referenced matter, pending the Court's ruling on Defendants' Motion to Dismiss.

Respectfully Submitted,


Vincent G. Hughes (VH-3574)

*Request granted in part
and denied in part.
all document discovery will
proceed. Depositions will be
sought pending the determination
of the motion to dismiss.
So ordered: J. Hughes
9/16/11*